



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,
v.
Plaintiff,

Case: 4:25-cr-20081
Judge: Behm, F. Kay
MJ: Ivy, Curtis
Filed: 02-19-2025
SEALED MATTER (tt)

D-1 JASON GILLIARD, and
D-2 GERARDO ZUNIGA,
Defendants.

Violations:
21 U.S.C. § 846

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Conspiracy to Possess with Intent to Distribute Methamphetamine
21 U.S.C. §§ 846 and 841(a)(1)

D-1 JASON GILLIARD, and
D-2 GERARDO ZUNIGA,

From a date unknown to the Grand Jury, and continuing to on or about February 28, 2024, in the Eastern District of Michigan and elsewhere, JASON GILLIARD and GERARDO ZUNIGA knowingly and intentionally conspired, confederated, and agreed together and with each other, and with other persons, known and unknown to the grand jury, to possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts,

isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

Quantity of Methamphetamine Involved in the Conspiracy

1. With respect to JASON GILLIARD, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, 841(b)(1)(A)(viii).

2. With respect to GERARDO ZUNIGA, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, 841(b)(1)(A)(viii).

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a) and Title 18, United States Code, Section 924(d)(1).

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846 and 841, the defendants shall forfeit to the United States: (1) any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Dated: February 19, 2025

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

JULIE A. BECK
Acting United States Attorney

s/Anthony P. Vance
ANTHONY P. VANCE
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s/Katharine Hemann
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Companion Case information MUST be completed by A

United States District Court Eastern District of Michigan	Criminal Case Co
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to con

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes	X No	AUSA's Initials: KH

Case Title: USA v. Jason Gilliard et al

County where offense occurred: Genesee County

Check One: X Felony Misdemeanor Petty

Indictment/ ___ Information --- no prior complaint.
 Indictment/ ___ Information --- based upon prior complaint [Case number:]
 Indictment/ ___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

Date: February 19, 2025

s/Katharine Hemann
 Katharine Hemann
 Assistant United States Attorney
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 Attorney Bar #: WSBA# 46237

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.